
**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

NO. 17-cv-04462-PD

**KATHLEEN M. JUNGCLAUS
Plaintiff**

v.

**WAVERLY HEIGHTS, LTD.
Defendant**

**PLAINTIFF'S MEMORANDUM OF LAW IN OPPOSITION TO
DEFENDANT WAVERLY HEIGHTS LTD.'s MOTION FOR SUMMARY JUDGMENT**

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ORAL ARGUMENT REQUESTED

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